



03-CV-02630-PET

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BRIAN D. BORGELT and CHARLES N.
CARR, dba BULL'S EYE SHOOTERS
SUPPLY,

Petitioners,

v.

THE BUREAU OF ALCOHOL, TOBACCO
AND FIREARMS

Respondent.

CV03-2630

NO.

PETITION FOR REVIEW OF AGENCY
REVOCATION OF FEDERAL
FIREARMS LICENSE

Come now the petitioners, Brian Borgelt and Charles N. Carr, d/b/a Bull's Eye Shooters Supply, by and through their counsel, C. James Frush of the law firm of Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim LLP, and hereby petition this Honorable Court, pursuant to 18 U.S.C. § 925(f)(3), for judicial review by the United States District Court of the Final Notice of Revocation of Firearms License.

Petitioners hold federal firearms license No. 9-91-027-01-3E-38708, as dealers in firearms other than destructive devices, issued to Brian D. Borgelt and Charles N. Carr, dba Bull's Eye Shooters Supply, 414 Puyallup Avenue, Tacoma, Washington 98421. On or about December 4, 2002, Richard Van Loan, Director of Industry Operations for the Bureau of Alcohol, Tobacco and Firearms, provided petitioners notice of revocation of license. On or

PETITION FOR REVIEW OF REVOCATION - 1 of 2

(No. _____)
[97135 vl.doc]

ORIGINAL

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1 about December 11, 2002, petitioners requested a hearing before the Agency, pursuant to
 2 18 U.S.C. § 923(f)(2), on the issue of revocation of license No. 9-91-027-01-3E-38708. A
 3 hearing was held at the Jackson Federal Building in Seattle, Washington, 915 Second Avenue,
 4 Room 514, on April 16, 2003. On June 27, 2003, the Bureau of Alcohol, Tobacco and
 5 Firearms, acting through Richard Van Loan, Director of Industry Operations, issued a Final
 6 Notice of Revocation of Firearms License. The federal firearms license described above was
 7 revoked effective July 25, 2003.

8 18 U.S.C. § 923(f)(3) provides that after the hearing held pursuant to 18 U.S.C.
 9 § 923(f)(2), "the aggrieved party may at any time within sixty days after the date notice was
 10 given under this paragraph file a petition with the United States district court for the district in
 11 which he resides or has his principal place of business for a de novo judicial review of such
 12 ... revocation." Therefore, based on the foregoing, the petitioners hereby petition that this
 13 Honorable Court conduct a de novo judicial review of the revocation of federal firearms
 14 license No. 9-91-027-01-3E-38708 issued to Brian D. Borgelt and Charles N. Carr dba Bull's
 15 Eye Shooters Supply.

16 RESPECTFULLY SUBMITTED this 25th day of August, 2003.

17 GORDON, THOMAS, HONEYWELL, MALANCA,
 18 PETERSON & DAHEIM LLP

19 By



20 C. James Frush, WSBA No. 7092

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22 Attorneys for Petitioners

23 [25805-00001]

24 PETITION FOR REVIEW OF REVOCATION - 2 of 2

25 (No. _____)

26 [97135 v1.doc]

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